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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re

18 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

19 Debtor and  
20 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DEBTOR'S SUPPLEMENT TO THE  
DEBTOR'S EMERGENCY MOTION FOR  
INTERIM AND FINAL ORDERS  
(1) AUTHORIZING CONTINUED USE OF  
EXISTING CASH MANAGEMENT  
SYSTEM, OPERATIONAL BANK  
ACCOUNTS AND RELATED  
INVESTMENT ACCOUNTS;  
(2) AUTHORIZING MAINTENANCE OF  
EXISTING BUSINESS FORMS,  
(3) EXCUSING COMPLIANCE WITH  
SECTION 345(b); (4) AUTHORIZING  
CONTINUED USE OF CURRENT  
INVESTMENT POLICY; AND  
(5) SCHEDULING A FINAL HEARING**

*Filed concurrently with Supplemental  
Declaration of Joseph J. Passarello*

Date: August 24, 2023  
Time: 1:30 p.m.  
Via ZoomGov  
Judge: Hon. Dennis Montali

*Hearing Requested on Shortened Time*

The Roman Catholic Archbishop of San Francisco (“RCASF” or the “Debtor”), the debtor and debtor in possession in the above-captioned chapter 11 case (the “Bankruptcy Case”), hereby files this supplement (this “Supplement”) to the *Debtor’s Emergency Motion for Interim and Final Orders (1) Authorizing Continued Use of Existing Cash Management System, Operational Bank Accounts and Related Investment Accounts; (2) Authorizing Maintenance of Existing Business Forms, (3) Excusing Compliance With Section 345(b); (4) Authorizing Continued Use of Current Investment Policy; and Scheduling a Final Hearing*, filed on August 21, 2023, as ECF No. 9 (the “Motion”).<sup>1</sup> In support of this Supplement, the Debtor relies upon the *Supplemental Declaration of Joseph J. Passarello in Support of the Debtor’s Emergency Motion for Interim and Final Orders (1) Authorizing Continued Use of Existing Cash Management System, Operational Bank Accounts and Related Investment Accounts; (2) Authorizing Maintenance of Existing Business Forms, (3) Excusing Compliance With Section 345(b); (4) Authorizing Continued Use of Current Investment Policy* (“Supplemental Passarello Decl.”) filed concurrently herewith, and Debtor respectfully represents as follows:

**I.**

**SUPPLEMENT**

1. On August 21, 2023 (“Petition Date”), the RCASF filed a voluntary Chapter 11 petition and a host of first day motions requesting certain customary first day relief, including the Motion. Immediately after filing the first day motions, the Debtor reached out to the Cash Management Banks to provide them with notice of the Motion and work through logistical issues

<sup>1</sup> All capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Motion, the Passarello Declaration previously filed contemporaneously with the Motion, or the Background Passarello Decl, as applicable.

with attempting to convert the Bank Accounts to debtor in possession accounts. During one of those calls, BofA made the Debtor and its advisors aware of eight additional accounts (held at BofA) all of which have been open since before 2008—predating Mr. Passarello as CFO— and which are being used by four High Schools likely as their main operating accounts, development accounts, and/or payroll accounts (the “Additional Bank Accounts”). Although no funds in the Additional Bank Accounts have originated from the Debtor or its operations, and the Debtor has been largely unaware that the Additional Bank Accounts are listed under the Debtor’s employer identification number (“EIN number”). Additionally, certain representatives of the Debtor are listed as co-signors on the Additional Bank Accounts.

2. The Additional Bank Accounts have not been listed in the Debtor's general ledger, do not contain funds of the Debtor, and the Debtor does not use or control the operation of the Additional Bank Accounts; however, because they are listed under the Debtor's name at BofA, the Debtor hereby requests that the Court authorize the continued use of the Additional Bank Accounts in the ordinary course of business without the need to designate such accounts as debtor in possession accounts or otherwise complying with the requirements of Bankruptcy Code section 345(b).

3. Without this relief, these High Schools, which have just welcomed students back from summer break, will suffer irreparable harm if unable to access their funds or suffer a delay in use of those funds, as they need to cover day-to-day operating costs and make payroll for the teachers and staff in the upcoming days.

4. Additional information about the High Schools and the Additional Bank Accounts is included in the Supplemental Passarelllo Declaration filed concurrently herewith.

## II.

## RELIEF REQUESTED

5. By this Supplement, the Debtor requests that the Court authorize the continued use of the Additional Bank Accounts as used in the ordinary course of business, without the need to designate such accounts to debtor in possession accounts as outlined in the U.S. Trustee's

1 Guidelines. To implement this relief, the Debtor requests that the following language be added to  
2 the Debtor's proposed Order attached to the Motion:

3 The Debtor is excused from redesignating the Additional Bank Accounts as  
4 debtor in possession accounts and complying with the requirements of section  
5 345(b) as to the Additional Bank Accounts.

6  
7 Dated: August 22, 2023

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10  
11 By /s/ Paul J. Pascuzzi  
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17 Dated: August 22, 2023

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